

Exhibit 6

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JESSE HAMMONS,

Plaintiff,

v.

UNIVERSITY OF MARYLAND MEDICAL SYSTEM
CORPORATION, et al.

Defendants.

Case No. 1:20-cv-02088-DKC

**DECLARATION OF PAUL NICHOLSON IN SUPPORT
OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Paul Nicholson, declare as follows:

1. I make this Declaration in support of Defendants' University of Maryland Medical System Corporation ("UMMS"), UMSJ Health System, LLC ("UMSJ"), and University of Maryland St. Joseph Medical Center, LLC ("St. Joseph"), motion for summary judgment on Plaintiff Jesse Hammons' claim under Section 1557 of the Affordable Care Act.

2. I am currently employed as the Chief Financial Officer at St. Joseph. I have held this position since 2012.

3. In my role as Chief Financial Officer, I manage certain of St. Joseph's financial operations. My job duties include monitoring revenue and collection cycles, reviewing and analyzing quarterly financial reports, gathering documentary support for accounting purposes, and facilitating St. Joseph's application for and collection of federal funding.

4. Through my role as Chief Financial Officer, I have personal knowledge of St. Joseph's funding and financial operations. I am competent to testify about the contents of this Declaration if necessary.

5. St. Joseph provides nearly \$45 million in annual community benefits, including free primary care to uninsured and low-income patients. Each year, St. Joseph handles more than 14,000 patient admissions, 22,000 emergency visits, and almost 90,000 outpatient visits.

6. St. Joseph is a direct recipient of funds from the federal government. It receives federal funding through a variety of means, including the reimbursement of claims for treating patients covered by Medicare and Medicaid. St. Joseph also receives federal funding in the form of federal grants and other similar sources.

7. St. Joseph receives its federal funding directly from the federal source. The federal funds St. Joseph receives are not received by or passed through UMMS or any other UMMS-related entity before being disbursed to St. Joseph.

8. St. Joseph further uses these federal funds to continue running its healthcare programs and departments at the hospital, including its surgery and scheduling departments and OB-GYN department.

9. The federal funds that St. Joseph receives are not comingled or shared in any account with UMMS or any other UMMS-related entity.

* * *

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. I further reserve the right to supplement and/or amend this Declaration.

Dated: June 24, 2022

/s/ [Signature]

Raul A. M.
6/23/22.